

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

IN RE:

Rhona P. Julien.

Debtor

CHAPTER 13  
CASE NO. 10-22026-WCH

ASSENTED TO MOTION TO CONTINUE HEARING ON  
OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN  
AND OBJECTION TO CLAIM OF BANK OF AMERICA

Now come the debtor and Bank of America, N.A. successor by merger with BAC Home Loans Servicing, LP and move that the pending Objection to Confirmation of the Plan, originally filed on January 21, 2011 (Docket Entry #34) and the debtor's objection to the claim of BAC Home Loans Servicing, LP filed on March 2, 2011 (Docket Entry # 51) be continued generally.

As grounds, the parties state as follows:

1. After the objection to the plan and the objection to the claim were filed, the debtor filed her Adversary Complaint on April 3, 2011. (AP 11-01103) Both the objection to the plan and the objection to the claim have continued on a regular basis to coordinate with the adversary complaint.
2. The parties involved in the adversary case are attempting to resolve the issues and agree that this objection to the plan and objection to the claim will not be resolved until there is a resolution of the Adversary Complaint.

WHEREFORE, the parties jointly move that Bank of America's objection to the Chapter 13 plan and the debtor's objection to the claim of Bank of America be continued generally awaiting the disposition of the pending adversary complaint.

Respectfully submitted,  
Bank of America,  
s/b/m with BAC Home Loans Servicing LP  
By its Attorney

/s/ Deirdre M. Keady  
Deirdre M. Keady, Esquire  
BBO# 359020

*William J. Bell*

In Re: Rhona P. Julien  
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CHAPTER 13

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The Debtor,  
Rhona P. Julien,  
By her attorney,

/s/ Mark W. Miller  
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Dated: September 19, 2011

#### CERTIFICATE OF SERVICE

I, Deirdre M. Keady, Esquire, state that on September 19, 2011, I electronically filed the foregoing Assented To Motion To Continue Generally with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

Office of the U.S. Trustee  
Carolyn Bankowski, Esq. Chapter 13 Trustee  
Mark W. Miller, Esq. for the debtor  
Amy Azza, Esq. for GMAC Mortgage, LLC.  
Amber Kovach, Esq. for Family Legal

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non CM/ECF participants:

/s/ Deirdre M. Keady  
Deirdre M. Keady, Esquire  
BBO# 359020

Rhona P. Julien  
568 Eliot Street  
Milton, MA 02186

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